

Chuck,

You may submit a letter to the WECC Standards Committee requesting that the RMS AVR criterion and WECC's Minimum Operating Reliability Criteria be reviewed. Any refinements to these standards will follow the Process for Developing and Approving WECC Standards that can be found on Page III-147 of the Operating Committee Handbook, which is available from our web site at

<http://www.wecc.biz/modules.php?op=modload&name=Downloads&file=index&req=getit&lid=198>

. Please call if you have questions about the process.

Thanks,

Kenneth Wilson  
Ph (801) 582-0353  
Fax (801) 582-3918

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**From:** Chuck Solt [mailto:chuck@csolt.net]  
**Sent:** Thursday, June 22, 2006 9:16 AM  
**To:** Ken Wilson  
**Cc:** 'Ed Fishback'; 'Tony Wetzel'; 'Tony Wetzel'; Steve Rueckert  
**Subject:** RE: WECC Registration

Ken:

Thank you for your thorough reply.

In a different capacity, I serve as sub-contract staff for the California Rule 21 Working Group. I am right now in the process of preparing the agenda for our July 19 meeting. I will put the subject of the conflict between the IEEE 1547/Rule 21 and the WECC RMS/AVR requirement on the agenda.

Would it be appropriate for the Rule 21 WG to send a letter to WECC recommending that WECC change the AVR requirement? We also have representation on the IEEE 1547 rule development committee. We (the Rule 21 WG) could request the IEEE 1547 committee to do the same.

Please let me know if that would be the best way to proceed.

Chuck

J. C. Solt  
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-----Original Message-----

**From:** Ken Wilson [mailto:Ken@wecc.biz]  
**Sent:** Wednesday, June 21, 2006 4:29 PM  
**To:** Chuck Solt  
**Cc:** Ed Fishback; Tony Wetzel; Tony Wetzel; Steve Rueckert  
**Subject:** RE: WECC Registration

Chuck,

The following is in response to your e-mails below.

The owner(s) of the generators identified in your e-mail will not have to register with WECC because the generators are less than 10 MVA, do not interconnect at 100 kV or above, do not conduct business on the bulk electric system, and are not part of a special protection system. The summary in your e-mail of duties and obligations seems to be correct based upon the information provided.

The following is in response to your questions.

1. Are there any advantages to registering, even though we are not required to do so?

Through registration and becoming a WECC member your organization(s) would become part of an organization designed to promote reliability in the Western Interconnection. Your organization would have a voice in the development of policies, procedures, and standards influencing all entities synchronized to the interconnection.

2. Is there any downside to registering? Do we incur any obligations or liabilities by registering?

The act of registration identifies the WECC and NERC reliability standards with which an entity is required to comply. By signing the Participating Generator Agreement (PGA) your generators may have already incurred these obligations. If an entity fails to comply with WECC and NERC reliability standards, it could be subject to sanctions and monetary penalties. If a violation of these standards results in outages, the entity may be subject to other liabilities.

You are the first to indicate there might be a conflict between Rule 21 of the California Energy Commission, IEEE, and the RMS Automatic Voltage Regulator (AVR) Criterion. The WECC AVR criterion was developed through an open standards development process and was approved by FERC. To correct a conflict between two rules requires the submission of a recommendation to refine the RMS Criteria Agreement. Technical justification and reasons for making the change would have to be submitted. Any recommendation would have to follow WECC's Standard Development Procedure and requires an amendment to the RMS Criteria Agreement.

Your questions and comments are very much appreciated.

Thanks,

Kenneth Wilson  
Ph (801) 582-0353  
Fax (801) 582-3918

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**From:** Chuck Solt [mailto:chuck@csolt.net]  
**Sent:** Wednesday, June 14, 2006 10:38 AM  
**To:** Steve Rueckert  
**Cc:** Ed Fishback; 'Tony Wetzel'; Ken Wilson; 'Tony Wetzel'  
**Subject:** RE: WECC Registration

Steve:

Further to my email below, and in particular, Sub-bullet 3, I have looked at Rule 21 voltage regulation requirements. Rule 21 is a uniform interconnection requirement for units under 10 MW contained in the tariffs of all 3 California utilities. The rule was developed by a working group of over 250 stakeholders under the supervision of the California Energy Commission ([www.rule21.ca.gov](http://www.rule21.ca.gov)). It says:

**“§D.2.a Voltage Regulation.** The GF [generating facility] shall not actively regulate the voltage at the PCC [point of common coupling] while in parallel with EC’s [Electric Corporation’s] Distribution System.”

This problem is not limited to California. IEEE 1547 is the new interconnection standard and its provisions are adopted directly or by reference in the interconnections standards in many states. IEEE 1547 carries the same requirement, that the GF shall not actively regulate the voltage at the PCC while in parallel with the EC distribution system.

I am hoping this is not a conflict with the WECC RMS requirements.

Chuck

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-----Original Message-----

**From:** Chuck Solt [<mailto:chuck@csolt.net>]

**Sent:** Tuesday, June 13, 2006 5:05 PM

**To:** 'steve@wecc.biz'

**Cc:** Ed Fishback ([efishback@caiso.com](mailto:efishback@caiso.com)); 'Tony Wetzel'; 'ken@wecc.biz'

**Subject:** WECC Registration

Steve:

I have had conversations with several people from WECC including Ken Wilson. He suggested I send this email to you for clarification and confirmation of my understanding

I am consulting for a company in California who has 5 landfill gas generation projects in operation. They have been delivering power to the local utility under standard offer contracts. They are converting them to Cal ISO Participating Generator Agreements. The generation sites are between 4 and 6 MW.

They received legal council that when they convert each facility to a Cal ISO PGA, they would have to “Register” the facility with NERC and WECC. I have been investigating the subject and come to the following conclusions:

- Since each facility will not be delivering into the Bulk Power System (they connect to the local utility at 12 KV) we will not need to register with NERC.
- We will not have to register with WECC.

- Under our PGA with the Cal ISO, we will be required to meet the requirements of the RMS.
  - Since the units do not currently have PSS and are less than 10 MW, we will not need PSS.
  - Since we are less than 10 MW we will not need to report AVR.
  - We may still be obligated to operate the excitation system in voltage regulation mode with current limiting. We would prefer not to have this obligation. We will be operating on a 12 KV distribution system. Voltage regulation mode may be helpful to the local utility if they are on a remote feeder, but I can't see how it would help the ISO grid.
- Although we are not required to register with the WECC, we can if we choose.

I have two questions in this regard:

1. Are there any advantages to registering, even though we are not required to do so?
2. Is there any downside to registering? Do we incur any obligations or liabilities by registering?

Thank you for your assistance.

Chuck Solt

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